

**MEMO ENDORSED**

MICHAEL A. CARDOZO
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

CARYN ROSENCRANTZ
Assistant Corporation Counsel
Tel.: (212) 788-1276
Fax: (212) 788-9776

May 30, 2008

BY FACSIMILE

Honorable Frank Mass
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Victor TR Djangmah v. Lt. John Doe, NYC PD 52 Pct., et al, 08 CV 4027
(PAC) (FM)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division at the Office of the Corporation Counsel assigned to handle the defense of the above-referenced matter. In that capacity, I write to respectfully request (1) that this office be granted sixty (60) days from May 30, until July 30, 2008, in which to comply with Your Honor's Order pursuant to Valentin v. Dinkens, dated May 12, 2008 and (2) that Your Honor direct plaintiff to provide this office with more specific identifying information by a date certain so that this office may comply with Your Honor's Order.

By Order dated May 12, 2008, Your Honor directed this Office to ascertain the full names of the police officers who were involved in the April 29, 2007 incident alleged by plaintiff, and to provide plaintiff with addresses where these police officers could be served with copy of the summons and complaint. As a threshold matter, an enlargement of time is necessary so that this office can forward to plaintiff for execution authorizations for the release of the underlying arrest, criminal prosecution and medical records. This office cannot obtain these records without the authorizations, and without the records we cannot comply with Your Honor's Order.

Additionally, plaintiff identifies the officer involved in the incident as, "John Doe, Lt. Command, NYC PD, 52nd Precinct." This description is vague and we require more identifying information from plaintiff in order to comply with Your Honor's Order. Thus, if plaintiff could provide the gender, race, or some other physical or identifying characteristic, it would greatly aid our efforts in attempting to ascertain the identification of the John Doe Lieutenant.

No previous request for an enlargement of time has been made. Accordingly, this office respectfully requests sixty (60) days from today, until July 30, 2008, in which to comply with Your Honor's May 12, 2008, Order and that Your Honor direct plaintiff to provide this office with more specific identifying information by a date certain so that this office may comply with Your Honor's Order.

I thank Your Honor for considering the within requests.

Respectfully submitted,



Caryn Rosencrantz
Assistant Corporation Counsel
Special Federal Litigation

cc: Victor TR Djangmah (# 2410718233)
Port Isabel Detention Center
279 Buena Vista Blvd.
Los Fresnos, TX 78566

**APPLICATION GRANTED
SO ORDERED**



Frank Maas, USMJ 5/20/08